

Section 1. Registration Information

Source Identification

Facility Name:	Lubrizol Advanced Materials, Inc Pedricktown Plant
Parent Company #1 Name:	The Lubrizol Corporation
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	USEPA RMP version, 6/18/2009
Receipt Date:	17-Jul-2019
Postmark Date:	17-Jul-2019
Next Due Date:	17-Jul-2024
Completeness Check Date:	13-Sep-2022
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0013 2126
Other EPA Systems Facility ID:	08067THBFGUSROU
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	12376732
Parent Company #1 DUNS:	4172565
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	76 Porcupine Road
Street 2:	
City:	Pedricktown
State:	NEW JERSEY
ZIP:	08067
ZIP4:	
County:	SALEM

Facility Latitude and Longitude

Latitude (decimal):	39.763889
Longitude (decimal):	-075.422778
Lat/Long Method:	Interpolation - Digital map source (TIGER)
Lat/Long Description:	Process Unit
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

Owner or Operator

Operator Name:	Lubrizol Advanced Materials, Inc.
Operator Phone:	(856) 351-2100

Mailing Address

Operator Street 1:	76 Porcupine Road
Operator Street 2:	
Operator City:	Pedricktown
Operator State:	NEW JERSEY
Operator ZIP:	08067
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Vitaly Volfson
RMP Title of Person or Position:	HSE&S Manager
RMP E-mail Address:	vitaly.volfson@lubrizol.com

Emergency Contact

Emergency Contact Name:	Vitaly Volfson
Emergency Contact Title:	HSE&S Manager
Emergency Contact Phone:	(856) 351-2108
Emergency Contact 24-Hour Phone:	(856) 230-6720
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	vitaly.volfson@lubrizol.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	(856) 351-2100
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Oldmans Township OEM
-------	----------------------

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	43
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	26-Mar-2019
Last Safety Inspection Performed By an External Agency:	State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:
Preparer Phone:
Preparer Street 1:
Preparer Street 2:
Preparer City:
Preparer State:
Preparer ZIP:
Preparer ZIP4:
Preparer Foreign State:
Preparer Foreign Country:
Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
-----------------------	---

Process Chemicals

Process ID:	1000101639
Description:	Acrylic latex
Process Chemical ID:	1000127395
Program Level:	Program Level 3 process
Chemical Name:	Acrylonitrile [2-Propenenitrile]
CAS Number:	107-13-1
Quantity (lbs):	370000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000101639
Process NAICS ID:	1000102902
Program Level:	Program Level 3 process
NAICS Code:	325211
NAICS Description:	Plastics Material and Resin Manufacturing

Process ID:	1000101639
Process NAICS ID:	1000102901
Program Level:	Program Level 3 process
NAICS Code:	32599
NAICS Description:	All Other Chemical Product and Preparation Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000081314

Percent Weight:	
Physical State:	Liquid
Model Used:	EPA's OCA Guidance Reference Tables or Equations
Release Duration (mins):	60
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Rural

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000086806

Percent Weight:	
Physical State:	Liquid
Model Used:	EPA's OCA Guidance Reference Tables or Equations
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	Yes
Berms:	
Drains:	Yes
Sumps:	Yes
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	reduce building ventilation, thermal oxidation

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

The facility has one Prevention Plan for the Acrylic Latex process. All elements apply.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000107114
Chemical Name:	Acrylonitrile [2-Propenenitrile]
Flammable/Toxic:	Toxic
CAS Number:	107-13-1

Process ID:	1000101639
Description:	Acrylic latex
Prevention Program Level 3 ID:	1000085854
NAICS Code:	325211

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	26-Oct-2018
---	-------------

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	20-Jul-2018
---	-------------

The Technique Used

What If:	Yes
Checklist:	
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	30-Mar-2020

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes

Earthquake:
Floods (Flood Plain):
Tornado:
Hurricanes:
Other Major Hazard Identified:

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	Yes
Emergency Air Supply:	Yes
Emergency Power:	
Backup Pump:	Yes
Grounding Equipment:	Yes
Inhibitor Addition:	Yes
Rupture Disks:	Yes
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	fire/vapor foam, process computer

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	computerized process parameters

Changes Since Last PHA Update

Reduction in Chemical Inventory:
Increase in Chemical Inventory:
Change Process Parameters:

Installation of Process Controls:
Installation of Process Detection Systems:
Installation of Perimeter Monitoring Systems:
Installation of Mitigation Systems:
None Recommended:
None: Yes
Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 23-Apr-2020

Training

Training Revision Date (The date of the most recent review or revision of training programs): 22-Oct-2018

The Type of Training Provided

Classroom: Yes
On the Job: Yes
Other Training:

The Type of Competency Testing Used

Written Tests: Yes
Oral Tests: Yes
Demonstration: Yes
Observation: Yes
Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 28-Feb-2019

Equipment Inspection Date (The date of the most recent equipment inspection or test): 03-Jul-2019

Equipment Tested (Equipment most recently inspected or tested): Premix 1

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures): 27-Jun-2019

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 20-Aug-2015

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review): 20-Jun-2013

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 27-Mar-2019

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 31-Dec-2019

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)): 28-Jun-2019

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): 31-Aug-2019

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 04-Jun-2014

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 10-Dec-2018

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 07-Jun-2017

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): 25-Apr-2016

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 15-May-2018

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 20-Jun-2019

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Salem County OEM

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (856) 769-2900

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52: Yes

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify): NJ TCPA

Executive Summary

2019 REVISED RMP EXECUTIVE SUMMARY:

Lubrizol Advanced Materials, Inc., PEDRICKTOWN NJ PLANT

The Stationary Source and Regulated Substances Handled: Acrylonitrile

The Lubrizol Advanced Materials, Inc. Plant in Pedricktown NJ is a specialty chemical manufacturing plant located in Salem County in south western New Jersey, two miles from the center of the rural town of Pedricktown. It is a 7-acre tract enclosed in a larger chemical facility, developed by BFGoodrich and now shared by Lubrizol, Mexichem and OxyVinyls LP. We manufacture more than 110 different acrylic latex emulsions.

Acrylic latex emulsion is a non-toxic, water-based dispersion of rubber. It is typically used as a coating or an adhesive in a wide variety of industries including paper, nonwovens, textiles, and industrial coatings or paints. In many cases, it has been used to replace a solvent based adhesive or coating, with the net result being a reduction in solvent emissions at our customer's plants

We have 44 employees with an annual payroll of \$4 million, paying about \$400,000 in taxes annually. Each year, we buy about \$3 million in goods and services, mainly from local suppliers, and pay about \$525,000 for utilities and more than \$5 million for freight services.

Our plant uses acrylonitrile as a raw material, which brings us under the EPA Risk Management Program (RMP) Rule. Acrylonitrile is a toxic chemical, listed under the RMP Rule. The programs required by the RMP to prevent serious accidents and to plan emergency contingencies have long been in place at our plant. We have long understood the relationship between good safety and good business.

The accidental release prevention program and emergency response policies at the stationary source:

It is the policy of the Lubrizol Pedricktown plant to meet and often exceed requirements established by applicable safety, health and environmental regulations promulgated by Federal and state agencies. Our safety policies and practices have historically preceded the regulation of such practices under, for example, the OSHA Process Safety Management Standard and the EPA Risk Management Program Rule. In New Jersey, the Toxic Catastrophe Prevention Act (TCPA) has been in place since 1987. This regulation has mandated most of the requirements of RMP and has included an annual safety audit by the process safety engineers of the New Jersey Department of Environmental Protection. Our policy is to maintain at a practical minimum the potential for harm to on-site employees and contractors, the public, and the environment, and to have in place contingency actions, coordinated with local responding agencies, for the unlikely event of a serious accidental chemical release.

Another safety-related program in which we participate is Responsible Care under the American Chemistry Council, and we are certified under the ISO-9000 international quality standard.

The general accidental release prevention program and chemical-specific prevention steps:

The Lubrizol Pedricktown plant has in place a thorough, ongoing program of process safety management (PSM). This program calls for implementation and maintenance of procedural and engineered safeguards at the plant to minimize the likelihood of a significant release of a hazardous chemical, and to eliminate or reduce the effects of any release that might occur. We have invested and continue to invest substantial effort and capital in maintaining our strong safety performance.

We are involved in day-to-day safety-focused activities under our program that includes elements such as:

(1) Process Hazard Analyses - we routinely perform and maintain up to date, systematic and thorough studies of our operations to identify what could go wrong, identify means of eliminating or reducing design or procedural weaknesses, and implementing improvements.

(2) Process Design - our processes and equipment are designed for safety in accordance with applicable industry standards and best engineering practices. Designs include, as appropriate, automatic emergency shutdown systems, pressure relief devices, ventilation systems, and release sensor systems. Most of our process is computer-controlled (with operator back-up) which

includes internal checks for abnormal conditions, emergency shutdowns, and alarm systems. Our storage vessels, which contain the minimum inventory of hazardous chemicals, are all contained in concrete dikes.

(3) Training - our operations and maintenance personnel are trained thoroughly on their job tasks, on safe work practices as they apply to their jobs, and emergency contingency actions, before they may operate or maintain equipment. They also receive refresher training periodically. Certified technicians receive annual refresher training on all procedures for acrylonitrile handling and processing. Our procedures for operating and maintaining processes, general safe work practices, and emergency response, are fully documented and maintained at the plant. Technicians are tested on their knowledge of the procedures.

(4) Maintenance - each item of equipment at our plant that is involved in maintaining safety or in responding to an abnormal situation is inspected, tested and/or maintained on a frequency that reflects its service and condition.

(5) Management of Change - no change to equipment or procedural practices can take place at the plant without a thorough review of the implications of that change to safety. Changes must not adversely impact the safety built into the design and operations of our processes.

Our PSM program is tuned to reflect the specific hazards of the chemicals we use. For example, our operating, maintenance, safe work, and emergency procedures address personal protective equipment appropriate to the chemicals being handled. Also, equipment is selected based on its intended service and chemical exposures.

The five-year accident history

We have had no events at the Lubrizol Pedricktown plant that would qualify for inclusion in the RMP 5-year accident history. There has been no offsite impact caused by acrylonitrile in the 49-year history of the facility.

The emergency response program

We have in place a written emergency response plan that we coordinate with the Oldmans Township LEPC, the Pedricktown and Auburn Volunteer Fire Departments, and other local responders. New personnel are trained on the plan. We conduct refresher training annually, and we train on any revisions to the plan. The plan is in compliance with the RMP requirements, as well as other applicable EPA and OSHA requirements. The plant fire brigade is maintained in conjunction with the site's other two chemical companies, Mexichem and Oxy Vinyls.

Our safety program is ongoing, involving constant identification and implementation of incremental safety improvements.